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13 IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA, ) Civil No. S-91-0768 JAM-JFM  
15 )  
Plaintiff, ) (Consolidated for all purposes with  
16 v. ) Civil No. S-91-1167 JAM-JFM)  
IRON MOUNTAIN MINES, INC. and )  
17 T.W. ARMAN, )  
18 )  
Defendants. )  
19 ) **PLAINTIFF UNITED STATES'**  
STATE OF CALIFORNIA, On behalf of the ) **NOTICE OF MOTION AND**  
20 California Department of Toxic Substances ) **MOTION AND APPLICATION**  
Control and the California Regional Water ) **FOR EXPEDITED**  
21 Quality Control Board for the Central Valley ) **CONSIDERATION AND**  
Region, ) **SHORTENING OF TIME**  
22 )  
Plaintiff, )  
23 v. ) Date and Time to  
Be Determined by Court  
IRON MOUNTAIN MINES, INC. and )  
24 T.W. ARMAN, )  
25 ) Courtroom No. 6  
Defendants. )  
26 )  
AND RELATED COUNTER- AND )  
27 THIRD-PARTY CLAIMS )  
28 )

**MOTION AND APPLICATION FOR  
EXPEDITED CONSIDERATION AND SHORTENING OF TIME**

The United States moves for expedited consideration and shortening of time to respond to its motion, of this date, for scheduling defendants' reconsideration motion. Specifically, the United States moves this Court to require defendants to respond to the United States' Motion for Scheduling Defendants' Reconsideration Motion no later than noon Pacific Standard Time on December 22, 2009, and moves this Court to decide the same Motion before Christmas. The United States makes this Motion pursuant Local Rule 6-144. In support of this Motion and Application, the United States submits a supporting declaration by counsel for the United States and a Proposed Order. The reasons for this Motion and Application are stated in the supporting declaration by counsel. Counsel for the defendants does *not* consent to this Motion. His reasons are quoted in paragraph 20 of the supporting declaration to this Motion.

Dated: December 18, 2009

Respectfully submitted,

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/s/ Larry Martin Corcoran  
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CERTIFICATE OF SERVICE

I Hereby Certify That, on December 18, 2009, I caused PLAINTIFF UNITED STATES' NOTICE OF MOTION AND MOTION AND APPLICATION FOR EXPEDITED CONSIDERATION AND SHORTENING OF TIME, supporting declaration of myself, and Proposed Order, to be filed electronically using the Court's ECF system, which will send notice of such filings to all registered counsel of record.

/s/ Larry Martin Corcoran  
LARRY MARTIN CORCORAN  
Attorney for Plaintiff  
United States of America